## STATEMENT OF

CAPTAIN GEORGE F. IRELAND

CHIEF, MARINE SAFETY DIVISION

UNITED STATES COAST GUARD DISTRICT ONE

BEFORE THE

House Committee on Merchant Marine and Fisheries

SUBCOMMITTEE ON COAST GUARD AND NAVIGATION

AND THE

SUBCOMMITTEE ON FISHERIES AND WILDLIFE CONSERVATION

AND THE ENVIRONMENT

OCTOBER 11, 1985

GOOD MORNING, MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEES. I AM CAPTAIN
GEORGE F. IRELAND, CHIEF, MARINE SAFETY DIVISION, FIRST COAST GUARD DISTRICT.
IN THIS CAPACITY I AM CHARGED WITH IMPLEMENTATION OF THE COAST GUARD'S
UNINSPECTED COMMERCIAL FISHING VESSEL SAFETY PROGRAM WITHIN THE FIRST COAST
GUARD DISTRICT AND REPORT TO THE CHIEF OF STAFF, FIRST COAST GUARD DISTRICT WITH
THAT RESPONSIBILITY. WITH ME IS CAPTAIN GORDON G. PICHE, CHIEF, MARINE
TECHNICAL AND HAZARDOUS MATERIALS DIVISION OF THE OFFICE OF MERCHANT MARINE
SAFETY, U.S. COAST GUARD HEADQUARTERS, WHO IS ALSO CHARGED WITH DIRECTING THE
COAST GUARD'S FISHING VESSEL SAFETY TASK FORCE. WE ARE PLEASED TO HAVE THIS
OPPORTUNITY TO APPEAR BEFORE YOU TO ADDRESS THIS SUBJECT OF MUTUAL INTEREST.

COMMERCIAL FISHING ACTIVITY IS ESSENTIALLY FREE OF FEDERAL REGULATIONS DEALING WITH VESSEL SAFETY. THE ONLY MINIMUM SAFETY STANDARDS APPLICABLE TO FISHING VESSELS COVER LIFESAVING AND FIREFIGHTING EQUIPMENT. IT IS GENERALLY ACKNOWLEDGED THAT COMMERCIAL FISHERMEN ARE ENGAGED IN ONE OF THE MOST HAZARDOUS OF ALL OCCUPATIONS. A U.S. COAST GUARD ANALYSIS OF COMMERCIAL FISHING VESSEL LOSSES DURING THE PERIOD 1970-1982 SUPPORTED THIS STATEMENT BY CONCLUDING THAT THIS OCCUPATION HAD THE WORST SAFETY RECORD WHEN COMPARED TO OTHER INDUSTRIES EXAMINED BY THE NATIONAL SAFETY COUNCIL. SUPPORTING CASUALTY DATA, MAINTAINED AT COAST GUARD HEADQUARTERS, ARE COMPILED FROM REPORTS OF CASUALTIES AND PERSONNEL ACCIDENTS SUBMITTED TO THE COAST GUARD BY VESSEL OWNERS, AGENTS, MASTERS OR PERSONS IN CHARGE OF A VESSEL AS REQUIRED BY TITLE 46 CODE OF FEDERAL REGULATIONS PART 4. FISHING VESSEL POPULATION DATA ARE OBTAINED FROM COAST GUARD VESSEL DOCUMENTATION FILES, WHICH SHOW THAT THERE ARE APPROXIMATELY 32,000 DOCUMENTED COMMERCIAL FISHING VESSELS IN SERVICE TODAY. THESE CASUALTY STATISTICS SHOW:

## NATIONALLY

- NEARLY 250 DOCUMENTED COMMERCIAL FISHING VESSELS, OF OVER FIVE NET TONS, WERE LOST EACH YEAR DURING THE FOUR YEAR PERIOD 1981-1984. THIS IS A JUMP FROM THE PREVIOUS TEN YEARS WHERE LOSSES RANGED BETWEEN 150 AND 200 EACH YEAR.
- LOSS RATES OF LARGE (OVER 100 GROSS TONS) FISHING VESSELS ARE FIVE TO SEVEN TIMES GREATER THAN LOSS RATES FOR U.S. OCEANGOING CARGO SHIPS.
- THE DEATH RATE FOR FISHERMEN IS SEVEN TIMES THE NATIONAL AVERAGE FOR ALL INDUSTRY GROUPS. AN AVERAGE OF 84 LIVES WERE LOST EACH YEAR DURING THE FOUR YEAR PERIOD 1981-1984.

## IN THE NEW ENGLAND REGION

- AN AVERAGE OF 33 COMMERCIAL FISHING VESSELS HAVE BEEN LOST EACH YEAR SINCE 1981.
  - AN AVERAGE OF SEVEN FISHERMEN HAVE LOST THEIR LIVES EACH YEAR SINCE 1981.
- DEATHS, VESSEL LOSSES AND CASUALTIES ARE IN PROPORTION WITH OTHER AREAS OF THE COUNTRY.

VESSEL SINKINGS AND LOSS OF LIFE INCIDENTS ARE READILY KNOWN TO THE COAST GUARD BECAUSE OF OUR RESPONSIBILITIES IN THE RELATED SEARCH AND RESCUE MISSIONS AND REQUIRED INVESTIGATIONS; THEREFORE, WE FEEL THESE STATISTICS ARE MORE RELIABLE

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THAN THOSE FOR PERSONNEL INJURIES AND VESSEL CASUALTIES WHICH DO NOT INVOLVE A
TOTAL VESSEL\_LOSS OR LOSS OF LIFE. CASUALTIES INVOLVING THE SMALLER
STATE-NUMBERED BOATS USED FOR COMMERCIAL FISHING ARE NOT CONSIDERED IN THE
ANALYSIS.

HUMAN ERROR PLAYS A MAJOR ROLE IN FISHING VESSEL ACCIDENTS. ESTIMATED TO BE A DIRECT OR INDIRECT INFLUENCE IN 80 PERCENT OF THESE CASUALTIES, CAUSAL HUMAN FACTORS OFTEN STEM FROM VESSEL OPERATIONS WHICH DO NOT RELATE TO THE BUSINESS OF CATCHING FISH. THESE INCLUDE POOR WATCHKEEPING PRACTICES AND PROCEDURES, LACK OF PREVENTIVE MAINTENANCE, NAVIGATIONAL ERRORS, RULES OF THE ROAD VIOLATIONS, AND A GENERAL LACK OF UNDERSTANDING OF THE VARIOUS FORCES ACTING UPON THE VESSEL, ESPECIALLY THOSE AFFECTING STABILITY.

FOUNDERING, FLOODING AND CAPSIZING ARE THE GREATEST CONTRIBUTORS TO LOSSES.

CASUALTY DATA SHOW THESE CONTRIBUTE TO APPROXIMATELY 43 PERCENT OF ALL LOSSES.

SOME LOSSES DUE TO CAPSIZING CAN BE TRACED DIRECTLY TO THE MANNER IN WHICH THE VESSEL WAS OPERATED. IN A NUMBER OF CASUALTY REPORTS, THE VESSEL MET THE INTERNATIONAL MARITIME ORGANIZATION (IMO) RECOMMENDED STABILITY CRITERIA AT THE TIME IT WAS PUT IN SERVICE AND HAD STABILITY LOADING INFORMATION, YET, THE OPERATOR NEGLECTED TO LOAD OR OPERATE THE VESSEL IN ACCORDANCE WITH THOSE INSTRUCTIONS.

FIRES AND EXPLOSIONS ARE THE SECOND GREATEST CONTRIBUTOR TO LOSSES, ACCOUNTING
FOR APPROXIMATELY 25 PERCENT OF THE LOSSES. OVER TWO THIRDS OF THESE CASUALTIES
OCCURRED IN THE ENGINEROOM SPACES AND ARE ATTRIBUTABLE TO MACHINERY OR
ELECTRICAL FAILURE OR MALFUNCTION. LACK OF VESSEL "HOUSEKEEPING" ALSO IS KNOWN
TO CONTRIBUTE TO SOME OF THOSE LOSSES.

ANALYSIS OF THE CAUSES OF CASUALTIES SUGGESTS THAT MANY COULD HAVE BEEN PREVENTED OR THEIR SEVERITY DIMINISHED IF MORE PRECAUTIONS HAD BEEN TAKEN OR IF THE VESSEL HAD BEEN OPERATED MORE PRUDENTLY. INSTALLATION OF SAFETY DEVICES SUCH AS FIRE AND SMOKE DETECTORS. AND BILGE ALARMS MAY HAVE MINIMIZED THE SEVERITY OF SEVERAL VESSEL CASUALTIES BY PROVIDING EARLY WARNING TO CREWMEMBERS WHO IN TURN WOULD HAVE HAD TIME FOR EFFECTIVE RESPONSE TO THE INDICATED PROBLEM AREA.

THE CARRIAGE AND USE OF CERTAIN LIFESAVING EQUIPMENT SUCH AS AN EMERGENCY POSITION INDICATING RADIO BEACON (EPIRB). AN INFLATABLE LIFE RAFT AND EXPOSURE SUITS COULD HAVE PREVENTED LOSS OF SEVERAL LIVES BY PINPOINTING THE EXACT LOCATION OF PERSONS IN DISTRESS THUS REDUCING SEARCH TIME WHILE PROVIDING A MUCH LESS HOSTILE ENVIRONMENT FOR THOSE IN DISTRESS.

GENERALLY, CAUSES FALL INTO THREE CATEGORIES: HUMAN ERROR, VESSEL RELATED, OR ENVIRONMENTAL, BUT SELDOM IS THE CAUSE THE RESULT OF A SINGLE FAILURE, RATHER, THE CAUSE IS USUALLY THE RESULT OF A CHAIN OF EVENTS WHICH CULMINATE IN AN ACCIDENT.

FACED WITH INCREASED COMPETITION FOR LIMITED RESOURCES, OPERATORS SOMETIMES EMBARK ON VOYAGES UNDER CONDITIONS WHICH WOULD OTHERWISE DICTATE STAYING IN PORT. VESSELS ROUTINELY ENCOUNTER CONDITIONS WHICH SEVERELY TAX THEIR CAPABILITIES SUCH AS HEAVY WEATHER, ESPECIALLY DURING THE WINTER MONTHS. IN RECENT MONTHS, BECAUSE REALIGNMENT OF THE CANADIAN AND U.S. BOUNDARY IN THE GULF OF MAINE PLACED MUCH OF THE NORTHEAST PEAK OF GEORGES BANK IN CANADIAN

WATERS, SOME LARGER BOATS HAVE MADE VOYAGES TO FISHING GROUNDS KNOWN AS FLEMISH CAP. THIS AREA, LOCATED APPROXIMATELY 330 MILES EAST OF ST. JOHNS, NEWFOUNDLAND, AND 1120 MILES FROM GLOUCESTER, REPRESENTS OVER THREE DAYS' ADDITIONAL TRANSIT TIME, FURTHER PLACING THESE VESSELS AT RISK TO THE ELEMENTS.

SOME HAVE SUGGESTED A MANDATORY LICENSING OF PERSONNEL AND A VESSEL INSPECTION SCHEME AS MEANS TO IMPROVE FISHING VESSEL SAFETY. WHILE A LICENSING OR CERTIFICATION PROGRAM IS ATTRACTIVE TO SOME BECAUSE IT PROVIDES AN AVENUE OF ENFORCEMENT, THE COAST GUARD BELIEVES THAT A VOLUNTARY PROGRAM CAN PROVIDE AN EQUIVALENT DEGREE OF SAFETY WITHIN A REASONABLE PERIOD OF TIME FOR THIS POPULATION OF ACTIVITY. TO THIS END, THE COAST GUARD DESIRES TO CREATE A FRAMEWORK THROUGH WHICH INDUSTRY CAN IMPROVE ITS SAFETY RECORD WITHOUT GOVERNMENT REGULATION. IF LICENSING OF PERSONNEL AND VESSEL INSPECTION PROGRAMS WERE MANDATED BY CONGRESS, THE COAST GUARD WOULD NEED A SUBSTANTIAL INCREASE IN RESOURCES. FOR EXAMPLE, TAKING INTO ACCOUNT THE TIME REQUIRED FOR IMPLEMENTATION OF REGULATORY STANDARDS, IT WOULD TAKE AT LEAST FOUR YEARS TO ISSUE APPROXIMATELY 67,000 LICENSES THAT WOULD BE REQUIRED. OUR TOTAL LICENSING ACTIVITY WOULD INCREASE BY 67 PERCENT PER YEAR. INSPECTION AND CERTIFICATION OF FISHING VESSELS WOULD INCREASE THE TOTAL NUMBER OF VESSELS IN THAT CATEGORY BY 200 PERCENT. THE IMPOSITION OF USER FEES FOR INSPECTION AND LICENSING WOULD NECESSARILY BE A PART OF ANY REGULATORY PROGRAM.

IN FEBRUARY 1984 ADMIRAL GRACEY, COMMANDANT OF THE COAST GUARD, RECOMMENDED TO THE SECRETARY OF TRANSPORTATION A FISHING VESSEL SAFETY INITIATIVE TO REDUCE THE NUMBER OF CASUALTIES IN THE UNINSPECTED COMMERCIAL FISHING VESSEL FLEET. THE SECRETARY ENDORSED THE INITIATIVE, AND FORMULATION OF A SAFETY PROGRAM BEGAN IN THE SPRING OF 1984. THE FISHING VESSEL SAFETY PROGRAM HAS EVOLVED AS A

COMPLETELY VOLUNTARY PROGRAM. THE CURRENT FISHING VESSEL SAFETY AND INSURANCE CRISIS HAS HELPED TO CREATE AN ATMOSPHERE IN WHICH OUR VOLUNTARY PROGRAM CAN BE EFFECTIVE IN REDUCING CASUALTIES AND LOSSES. A TWO-PRONGED APPROACH IS BEING PURSUED: VOLUNTARY VESSEL STANDARDS AND A SAFETY AWARENESS AND EDUCATION PROGRAM.

THE VOLUNTARY VESSEL STANDARDS CONSIST OF A SERIES OF FIVE NAVIGATION AND VESSEL INSPECTION CIRCULARS (NVICS), PUBLISHED BY THE COAST GUARD. ALL NVICS HAVE BEEN COMPLETED AND ARE AVAILABLE. THEY ARE TECHNICAL IN NATURE AND AIMED MORE AT FISHING VESSEL DESIGNERS, BUILDERS, AND OUTFITTERS; AND FOCUS ON SUCH SUBJECTS AS STABILITY; RADIO AND SHIPBOARD NAVIGATION EQUIPMENT; HULL, MACHINERY AND ELECTRICAL EQUIPMENT; FIRE PROTECTION; AND LIFESAVING AND PERSONNEL PROTECTION. THEY DO CONTAIN SOME SPECIFIC OPERATIONAL AND EDUCATIONAL MATERIAL TO FISHERMEN WHICH WILL BE INCORPORATED INTO A SAFETY GUIDE WHICH I WILL DISCUSS LATER. I HAVE WITH ME A COPY OF EACH AND WOULD LIKE TO HAVE THEM ENTERED AS PART OF OUR TESTIMONY.

SINCE INPUT FROM THE FISHING INDUSTRY AND OTHER INTERESTED PARTIES IS ESSENTIAL, WE PUBLISHED THE SERIES OF NVICS AS PROPOSED STANDARDS, WITH THE INTENTION OF REVISING THEM TO ADDRESS COMMENTS AND COMPILING THEM INTO ONE PUBLICATION IN THE SPRING OF 1986.

TO DATE THE COAST GUARD HAS DISTRIBUTED FOUR OF THESE NVICS TO OVER 170 INDIVIDUALS, GROUPS AND ORGANIZATIONS THROUGHOUT THE U.S. WHO HAVE AN INTEREST IN FISHING VESSEL SAFETY. THIS INCLUDES SAFETY CONSULTANTS, MARINE SURVEYORS, NAVAL ARCHITECTS, INSURANCE UNDERWRITERS, FISHING VESSEL AND OWNERS' ASSOCIATIONS, BOAT BUILDERS, FISHERIES UNIONS, PERSONNEL ASSOCIATED WITH THE

NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION (NOAA) SEA GRANT PROGRAM, AND NATIONAL MARINE FISHERIES SERVICE (NMFS) ADVISORY PERSONNEL. SEVERAL HAVE SENT DETAILED COMMENTS REGARDING THE FIRST TWO NVICS DEALING WITH STABILITY, AND RADIO AND SHIPBOARD NAVIGATION EQUIPMENT. ALL HAVE EXPRESSED A FAVORABLE REACTION TO THE STANDARDS.

THE COAST GUARD RECOGNIZES THAT THERE WILL BE SOME COSTS ASSOCIATED WITH MEETING THESE VOLUNTARY STANDARDS. MANY FISHING VESSELS, HOWEVER, ALREADY CARRY MUCH OF THE RECOMMENDED SAFETY EQUIPMENT. THE LARGEST SINGLE EXPENSE WOULD BE THE STABILITY ANALYSIS WHICH IS EXPECTED TO COST BETWEEN \$1,000 AND \$3,000 DEPENDING ON THE SIZE OF THE VESSEL AND THE COMPLEXITY OF THE OPERATION.

THE SAFETY AWARENESS AND EDUCATION PROGRAM CONSISTS OF THE DEVELOPMENT OF A FISHING VESSEL SAFETY GUIDE AND ASSOCIATED COURSES AIMED DIRECTLY AT FISHERMEN. THE GUIDE, WHICH IS EXPECTED TO BE COMPLETED BY APRIL 1986, WILL BE A BOOKLET WITH SEVERAL CHAPTERS WHICH PARALLEL THE VESSEL STANDARDS, BUT ARE PRESENTED IN PICTURES, DIAGRAMS AND LANGUAGE TAILORED FOR FISHERMEN. THE GUIDE IS BEING DEVELOPED IN A JOINT EFFORT BETWEEN THE NORTH PACIFIC FISHING VESSEL OWNERS' ASSOCIATION AND THE COAST GUARD TASK FORCE. THE FUNDING FOR THE INITIAL VERSION OF THE GUIDE IS \$45,500 FROM A DEPARTMENT OF COMMERCE SALTONSTALL—KENNEDY GRANT, \$21,375 FROM THE FISHING VESSEL OWNERS' ASSOCIATION AND \$40,000 FROM THE COAST GUARD. ADDITIONALLY, COAST GUARD PERSONNEL ARE ACTING AS TECHNICAL ADVISORS TO THE CONTRACTOR AND ARE PROVIDING HIM WITH DRAFTS OF CHAPTERS ON SUBJECTS IN WHICH WE HAVE EXPERTISE, INCLUDING; RULES OF THE ROAD, RUDIMENTS OF NAVIGATION, WATCHKEEPING, FIRE AND DAMAGE CONTROL, STABILITY, SAFETY AND SURVIVAL EQUIPMENT, AND COAST GUARD PROCEDURES AND STANDARDS. THE FINAL PRODUCT WILL BE TAILORED

FOR EACH PART OF THE COUNTRY; THEREFORE, OTHER FISHING VESSEL ASSOCIATIONS AND INTERESTED GROUPS WILL NEED TO GET INVOLVED. THE GUIDE WILL BE DISTRIBUTED PRIMARILY BY THE VESSEL OWNER ASSOCIATIONS AND THE NOAA SEA GRANT AND MARINE ADVISORY SERVICES' NATIONAL NETWORK.

THE TASK FORCE IS INVOLVING FISHING VESSEL INTERESTS TO THE MAXIMUM EXTENT THAT IT CAN. IT HAS COMMUNICATED WITH FISHING VESSEL OWNER ASSOCIATIONS, INSURANCE UNDERWRITERS AND BROKERS, MARINE SURVEYORS, OTHER GOVERNMENT AGENCIES SUCH AS THE NATIONAL MARINE FISHERIES SERVICE (NNFS) OF THE NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION (NOAA), CONGRESSIONAL STAFFERS, COAST GUARD DISTRICTS AND FIELD UNITS AND THE NOAA/SEA GRANT UNIVERSITY FISHING VESSEL SAFETY CENTERS. A MOST POSITIVE RESPONSE HAS COME FROM THE NORTH PACIFIC FISHING VESSELS OWNERS' ASSOCIATION, WHOSE MEMBERS ARE TAKING DECISIVE STEPS TO REGAIN THE CONFIDENCE OF THE INSURANCE INDUSTRY BY DEVELOPING A COMPREHENSIVE VESSEL SAFETY PROGRAM. TASK FORCE PERSONNEL HAVE DISCUSSED THE VOLUNTARY STANDARDS WITH THE ASSOCIATION MEMBERS AND INSURANCE INTERESTS, JOINED FORCES WITH THEM IN DEVELOPING THE CREW SAFETY GUIDE, AND TOTALLY SUPPORT THEIR EFFORTS TO CREATE LOCAL SAFETY TRAINING COURSES FOR FISHERMEN BASED ON THE GUIDE. THE COAST GUARD BELIEVES THIS EFFORT WILL BE THE MODEL THAT OTHER AREAS OF THE COUNTRY WILL BE ABLE TO FOLLOW AND TAILOR FOR THEIR PARTICULAR FISHERIES.

LOCALLY, WE HAVE TAKEN SOME INITIATIVES IN SUPPORT OF THE COMMANDANT'S OBJECTIVE TO REDUCE CASUALTIES AMONG THE UNINSPECTED COMMERCIAL FISHING VESSEL FLEET. IN MAY OF LAST YEAR THE COAST GUARD WAS MADE A MEMBER OF THE NORTHEAST MARINE ADVISORY COUNCIL (NENAC). NEMAC IS AN ORGANIZATION DEVOTED TO "MAKING A POSITIVE DIFFERENCE FOR THE MARINE CONSTITUENTS OF THE NORTHEASTERN UNITED STATES THROUGH COOPERATIVE, EDUCATIONAL PROGRAM INITIATIVES." THIS WILL ENABLE

US TO "LEVERAGE" OUR EFFORTS BY UTILIZING EXISTING NETWORKS ALREADY OPERATED BY OTHER MEMBER AGENCIES AND INSTITUTIONS SUCH AS NOAA, NMFS, NATIONAL WEATHER SERVICE, SEA GRANT EXTENSION PROGRAMS AND SEVERAL UNIVERSITIES. IN THE SHORT TERM, THIS ORGANIZATION PROVIDES AN EXCELLENT MEANS FOR US TO DISSEMINATE THE PUBLICATIONS JUST MENTIONED. IN THE LONGER TERM I AM HOPEFUL THAT NEWAC CAN HELP COORDINATE THE EFFORTS OF THE MEMBER AGENCIES AND INSTITUTIONS ON A LOCAL LEVEL TO MAKE US ALL MORE EFFECTIVE IN THE AREA OF FISHING VESSEL SAFETY.

IN JANUARY 1984 WE PUBLISHED THE THIRD EDITION OF OUR LOCALLY PREPARED FISHERMEN'S DIGEST. THIS 60 PAGE BOOKLET CONTAINS A GREAT DEAL OF SAFETY INFORMATION, PREPARED ESPECIALLY FOR COMMERCIAL FISHERMEN AND ADDRESSES TOPICS SUCH AS REGULATORY STANDARDS FOR FISHING VESSELS AND RECOMMENDED SAFETY PRACTICES. TOPICS INCLUDE PERSONNEL FLOTATION DEVICE REQUIREMENTS, HOW TO OPERATE COAST GUARD PORTABLE PUMPS, PROCEDURES FOR MEDICAL EVACUATION BY HELICOPTER, HYPOTHERMIA AND EPIRBS. FURTHER, A PORTUGUESE LANGUAGE EDITION HAS BEEN PUBLISHED AND DISTRIBUTED FOR THE BENEFIT OF THOSE FISHERMEN WHO READ AND SPEAK PORTUGUESE BETTER THAN THEY DO ENGLISH. AND, THROUGHOUT THIS PAST YEAR, THE COAST GUARD HAS PARTICIPATED IN SEVERAL SEMINARS, PANEL DISCUSSIONS AND PROVIDED EXHIBITS AT INDUSTRY FUNCTIONS ON THE SUBJECT OF FISHING VESSEL SAFETY. WITH REGARD TO "LEVERAGING", I SHOULD MENTION A VOLUNTEER ORGANIZATION LOCATED AT BAILEY'S ISLAND, MAINE. THIS GROUP, THE EASTERN CASCO BAY FISHERMEN'S RESCUE TEAM, ESTABLISHED FIVE YEARS AGO FOLLOWING A LOSS OF LIFE. INCIDENT, IS A VOLUNTEER GROUP CONSISTING PRIMARILY OF LOBSTERMEN WHO ARE ORGANIZED TO PROMOTE SAFETY AMONG THEMSELVES AND PERFORM EMERGENCY SERVICE FOR EACH OTHER. THEY WORK CLOSELY WITH THE LOCAL COAST GUARD UNITS AND SINCE THEIR FORMATION HAVE AN EXCELLENT SAFETY RECORD.

IN SUMMARY, WE FEEL OUR VOLUNTARY PROGRAM WILL MEET THE NEEDS OF INDUSTRY, THAT IS, BE THE FRAMEWORK THAT LOCAL FISHING AND INSURANCE GROUPS CAN USE TO ENSURE A REASONABLE LEVEL OF SAFETY AND REDUCE THE CASUALTY FIGURES. THE PROGRAM CAN BE IMPLEMENTED IN A RELATIVELY SHORT TIME AND HAVE AN IMMEDIATE IMPACT. THE INDUSTRY IS WILLING TO DO SOMETHING NOW. THE COAST GUARD IS MAKING ITS KNOWLEDGE AND EXPERIENCE WITH VESSEL SAFETY AVAILABLE IN A COOPERATIVE EFFORT WITH THE INDUSTRY. WE BELIEVE THE VOLUNTARY SAFETY PROGRAM WILL WORK.

THANK YOU, I WILL BE PLEASED TO ANSWER ANY QUESTIONS YOU WISH TO ASK.